

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

GEORGIA STATE CONFERENCE OF )  
THE NAACP, et al. )  
)  
*Plaintiffs,* ) Case No. 1:21-CV-5338-ELB-  
v. ) SCJ-SDG  
)  
STATE OF GEORGIA, et al. )  
)  
*Defendants.* )  
)  
\_\_\_\_\_)  
COMMON CAUSE, et al., ) Case No. 1:22-CV-00090-ELB-  
) SCJ-SDG  
*Plaintiffs,* )  
v. )  
BRAD RAFFENSPERGER )  
)  
*Defendant.* )

**[PROPOSED] SCHEDULING ORDER**

After reviewing the Joint Motion by State Defendants and Consolidated Plaintiffs to Amend Stipulation and Order Regarding Discovery, filed by Consolidated Plaintiffs and State Defendants, the Court orders the following adjustments to the schedule (Docs. 34 and 87) in this case.

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| Deadline for fact depositions for Plaintiffs or Defendants | January 20, 2023* |
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| Deadline for fact depositions for Third Parties   | January 20, 2023*   |
| Deadline for Plaintiffs' and Defendants' expert disclosures (reports)   | January 13, 2023  |
| Deadline for rebuttal expert disclosures (reports)  | February 10, 2023   |
| Deadline to complete expert discovery   | March 3, 2023   |
| Deadline, in the event that Defendants do not produce, by January 7, 2023, from each of the 2022 general and runoff elections both 1) election results by precinct and the 2) racial turnout data by precinct, for any supplemental report based on that data   | 2 weeks after the receipt of the data                       |
| Deadline, in the event that Defendants do not produce, by January 7, 2023, from each of the 2022 general and runoff elections both 1) election results by precinct and the 2) racial turnout data by precinct, for any supplemental rebuttal report             | 2 weeks after receipt of the supplemental report            |
| Deadline, in the event that Defendants do not produce, by January 7, 2023, from each of the 2022 general and runoff elections both 1) election results by precinct and the 2) racial turnout data by precinct to complete depositions, which will be limited to | 2 weeks after receipt of the supplemental rebuttal reports. |

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| the topics contained in the supplemental reports                    |                |
| Deadline to file motions for summary judgment                       | March 27, 2023 |
| Deadline to file responses to motions for summary judgment          | April 26, 2023 |
| Deadline to file replies in support of motions for summary judgment | May 10, 2023   |

\* Depositions may occur after January 20, 2023, if: i. they are based on information newly provided in documents produced or in depositions, by the Defendants, Third Parties, or Plaintiffs; ii. a deposition subpoena is issued within two weeks of that information provided; iii. Information newly provided includes any discovery to which Third Parties had previously contended was subject to legislative privilege, but that the Court orders to be produced.

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2022.

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**Steve C. Jones**  
United States District Judge